

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Chapter 13
Chaney, William
Chaney, Janet
Debtors/ Respondents : 16-12050 amc

**Answer to Motion of
For Relief from Automatic Stay**

Debtors, William and Janet Chaney, by and through their undersigned attorney, hereby provides the following answers to the Motion for Relief from Stay filed by Santander Consumer USA, Inc. ("Santander" and/or "Movant"). These responses are made without prejudice to debtors' right to present additional facts or contentions at a hearing based upon information hereinafter obtained or evaluated. Debtors specifically reserve the right to supplement or amend their responses or present additional facts and contentions at a later date to any of the answers given.

1. Denied. The averments contained in this Paragraph consist of mischaracterization or summarization of documents that speak for themselves and they are denied as no response is required.

2. Denied. The allegation is a legal conclusion of law to which no answer is required.

3. Denied. The averments contained in this Paragraph consist of mischaracterization or summarization of documents that speak for themselves and they are denied as no response is required.

4. -6. Denied. Debtors can neither admit nor deny the allegations because Debtor has no personal knowledge of the accuracy of such statement. Strict proof is hereby demanded.

7. (a) Denied. The allegation is a legal conclusion of law to which no answer is required.

For the reasons set forth above, among others, and based on this Court's authority under the Bankruptcy Code, the Debtors pray that the motion be denied, and such other relief as is just and proper. The Debtord specifically reserve the right to supplement the answer at or prior to the hearing thereon.

Dated: June 19, 2020

"/s/" Mitchell J. Prince
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